

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Lance E. Stone	:	Chapter 13
Javette L. Stone	:	
	:	
Debtors	:	Case No.: 18-14682-JKF

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**MOTION TO RECONSIDER DISMISSAL**

Comes Now, Lance and Javette Stone, hereinafter referred to as "Debtors" and move this Honorable Court to vacate its December 4, 2019 Order Dismissing the instant matter and in support thereof aver the following:

1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about July 16, 2018.
2. The Chapter 13 bankruptcy matter was assigned case number 18-14682.
3. The Chapter 13 Plan was confirmed by this Honorable Court on April 24, 2019.
4. On or about July 15, 2019 the Chapter 13 Trustee filed a Motion to Dismiss the instant matter for failure to make timely and regular Chapter 13 payments.
5. In furtherance of the Trustee's Motion the instant matter was dismissed on December 4, 2019.
6. Due to a miscommunication, Debtors case was dismissed prior to filing a Motion to Convert the case to Chapter 7.
7. The Debtors are desirous of converting their case to Chapter 7.

**WHEREFORE**, for the reasons stated herein, the Debtors respectfully request that this Honorable Court Reconsider its December 4, 2019 Order dismissing the instant matter.

Respectfully submitted,

Dated: December 10, 2019

/s/ Brad J. Sadek, Esquire  
Brad J. Sadek, Esquire  
Sadek and Cooper  
1315 Walnut Street  
Suite 502  
Philadelphia, PA 19107

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_ 2019, upon consideration of the Motion to Reconsider Dismissal, it is hereby;

ORDERED and DECREED that the motion is GRANTED and the Order of this Court dated December 4, 2019 Dismissing the case is vacated;

FURTHER ORDERED:

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Hon. Jean K. FitzSimon

UNITED STATES BANKRUPTCY COURT  
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CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below I served a true and correct copy of the Motion To Reconsider Dismissal by Regular US Mail or electronic means on all creditors and the following parties:

**SCOTT F. WATERMAN**  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

Respectfully submitted,

Dated: December 10, 2019

/s/ Brad J. Sadek, Esquire  
Brad J. Sadek, Esquire  
Sadek and Cooper  
1315 Walnut Street  
Suite 502  
Philadelphia, PA 19107